

Exhibit C

Robichaux Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Chapter 11
	§	
Abri Health Services, LLC, <i>et al.</i> , ¹	§	Case No. 21-30700 (sgj)
	§	
Debtors.	§	(Jointly Administered)
	§	

**DECLARATION OF LOUIS E. ROBICHAUX IV IN SUPPORT OF THE
APPLICATION OF DEBTORS FOR AUTHORITY TO EMPLOY
AND RETAIN ANKURA CONSULTING GROUP, LLC TO PROVIDE
EXPERT VALUATION AND RELATED SERVICES NUNC PRO TUNC TO JUNE 16,
2021**

Pursuant to 28 U.S.C. § 1764, I, Louis E. Robichaux IV, declare as follows:

1. I am a Senior Managing Director in the turnaround & restructuring practice of Ankura Consulting Group, LLC (“**Ankura**”). Except as otherwise noted, I have personal knowledge of the matters set forth herein, and if called and sworn as a witness, I could and would testify competently thereto.

2. This declaration (the “**Declaration**”) is made in support of the *Application Of Debtors For Authority To Employ And Retain Ankura Consulting Group, LLC To Provide Expert Valuation Services Nunc Pro Tunc to June 16, 2021* (the “**Application**”). Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Abri Health Services, LLC (3319) and Senior Care Centers, LLC (8550). The Debtors and Ankura have agreed, subject to the Court’s approval, to the terms and conditions set forth in the engagement letter (the “**Agreement**”) discussed in, and attached to, the Application.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Abri Health Services, LLC (3319) and Senior Care Centers, LLC (8550).

3. To the extent Ankura discovers additional facts bearing upon the matters described herein during the retention, Ankura will supplement the information contained in this Declaration, as required by Bankruptcy Rule 2014.

QUALIFICATIONS

4. Since its inception in 2014, Ankura has developed into a global provider of financial and restructuring advisory services to parties involved in distressed corporate matters, including, but not limited to: *In re Mayflower Communities, Inc.*, No. 19-30283 (HDH) (Bankr. N.D. Tex. Jan. 30, 2019); *In re Tarrant County Senior Living Center, Inc.*, No. 19-33756 (SGJ) (Bankr. N.D. Tex. Nov. 5, 2019); *In re Elk Petroleum, Inc.*, No. 19-11157 (LSS) (Bankr. D. Del. 2019); *In re Payless Holdings LLC*, No. 19-40883-659 (Bankr. E.D. Mo. Mar. 29, 2019); *In re 4 West Holdings, Inc.*, No. 18-30777 (HDH) (Bankr. N.D. Tex. Apr. 18, 2018); *In re Westinghouse Electric Co., LLC, et al.*, No. 17- 10751 (Bankr. S.D.N.Y. Nov. 9, 2017); *In re Foundation Healthcare, Inc.*, No. 17-42571 (RFN) (Bankr. N.D. Tex. July 20, 2017); *In re Model Reorg Acquisition, LLC*, Case No. 17-11794 (CSS) (Bankr. D. Del. 2017); *In re Last Call Guarantor, LLC*, Case No. 16-11844 (KG) (Bankr. D. Del. Sept. 2, 2016); and *In re SunEdison, Inc.*, No. 16-0992 (SMB) (Bankr. S.D.N.Y. Aug. 11, 2016).

5. Ankura has extensive experience in providing expert valuation services and restructuring advisory services in reorganization proceedings and have an excellent reputation for the services they have rendered in chapter 11 cases on behalf of parties in interest throughout the United States. Ankura's experience in the healthcare industry is extensive.

6. The two valuation experts proposed by Ankura for this engagement are highly experienced and possess industry-leading qualifications and credentials.

SERVICES TO BE RENDERED

7. The Debtors desire to obtain Ankura's expert valuation and litigation support services in connection with certain lease related claims and other matters associated with the Cases (the "**Projects**"). The services to be provided by Ankura include the following:

- a. Prepare valuation analyses of certain of the Company's skilled nursing facilities;
- b. If requested by the Company, prepare expert valuation reports and provide related expert witness testimony services;
- c. As requested by the Company and its bankruptcy counsel, advise the Company on bankruptcy and restructuring issues within Ankura's scope of expertise; and
- d. Perform such other professional services as may be requested by the Company and agreed to by Ankura in writing.

COMPENSATION

8. Pursuant to the Agreement, the Debtors shall pay Ankura based on its actual hours expended at Ankura's standard hourly rates that are in effect when the Services are rendered, subject to the limitations discussed herein. Ankura's rates generally are revised annually. Ankura's current hourly rates are as follows:

Professional	Hourly Rate
Senior Managing Director & Managing Director	\$650 - \$1,155
Other Professionals	\$350 - \$870
Paraprofessional	\$275 - \$330

9. Notwithstanding the foregoing, Ankura has agreed to cap its Fee (as defined in the Agreement) at \$250,000 for all final valuation reports (the "**Report Fee Cap**"). Any additional work other than completion of the Valuation Reports, including Company meetings, expert rebuttal reports, deposition and courtroom testimony, settlement mediation and related

preparation, will be billed on an hourly basis as described above and will not be subject to the Report Fee Cap.

10. Ankura shall be entitled to reimbursement of actual, reasonable out-of-pocket and direct expenses incurred in connection with the Services to be provided under this Agreement incurred in connection with this Agreement.

11. Prior to the Petition Date, Ankura did not provide any services to the Debtors. As of the Petition Date, no amounts were due or outstanding to Ankura, and Ankura has not been paid any amounts postpetition. Ankura is not holding a retainer.

DISINTERESTEDNESS

12. Ankura is aware that the Debtors have numerous creditors, stakeholders, and other parties with whom they maintain business relationships. Prior to the filing of this Declaration, Ankura obtained from the Debtors the names of the Debtors' directors and officers, prepetition and postpetition lenders, other secured creditors, certain unsecured creditors, five percent (5%) or greater shareholders, significant contract parties, and professionals, and other individuals and entities which may be parties in interest in these Cases (collectively, the "**Potential Parties in Interest**"), a list of which is attached hereto as Exhibit 1. Ankura maintains a database containing the names of current, former, and potential clients and other principal parties related to such clients. I caused Ankura to review and analyze the conflict database to determine whether Ankura has any connection with the Potential Parties in Interest. A list of connections to such Potential Parties in Interest is set forth on Exhibit 2.

13. As part of its diverse practice, Ankura appears in numerous cases, proceedings, and transactions that involve many different professionals, including attorneys, accountants, and financial consultants, who may represent claimants and parties in interest in these chapter 11 cases. Ankura has performed in the past, and may perform in the future, advisory consulting services for

various attorneys and law firms, and has been represented by several attorneys and law firms, some of whom may be involved in these proceedings. In addition, Ankura has in the past, may currently, and will likely in the future be working with or against other professionals involved in these chapter 11 cases in matters unrelated to the Debtors and these chapter 11 cases. Based on our current knowledge of the professionals involved, and to the best of my knowledge, none of these relationships create interests materially adverse to the Debtors in matters upon which Ankura is to be employed, and none are in connection with these chapter 11 cases. Ankura's connection to any Parties in Interest are attached hereto as Exhibit 2.

14. Ankura previously provided restructuring advisory services to Granite Investment Group (“**Granite**”), an adverse party in connection with Senior Care Centers’ previous chapter 11 cases (*In re Senior Care Centers, LLC, et al.*, Case No. 18-33967). Granite is not a party in interest in these chapter 11 cases. Further, Ankura’s work for Granite has concluded.² Thus, we do not believe Ankura’s prior engagement for Granite causes a conflict for Ankura in this matter.

15. Other than as set forth on Exhibit 2, I have determined that Ankura has not provided services to any Potential Parties in Interest over the past five (5) years related to the Debtors or these Chapter 11 cases.

16. To the best of my knowledge, and in view of the foregoing, Ankura and the senior professionals³ employed by it are disinterested persons who do not hold or represent an interest adverse to the estates and except as set forth above do not have any connection either with the Debtors, their creditors, or any other party in interest in these Cases or with their respective

² Ankura continues to respond to information requests from parties adverse to Granite concerning Ankura’s past services.

³ Includes Managing Directors and Senior Managing Directors.

professionals or accountants, with the judges of this Court, or with the United States Trustee or any person employed in the Office of the United States Trustee.

17. Ankura makes the following additional disclosures with respect to Ankura's disinterestedness. References to Ankura include all members expected to render services in these cases:

- a. Ankura is not a creditor, equity security holder, or insider of the Debtors;
- b. Ankura is not and was not investment bankers for any outstanding security of the Debtors;
- c. Ankura has not been, within three (3) years before the Petition Date, (i) investment bankers for a security of the Debtors, or (ii) an attorney for such investment banker in connection with the offer, sale, or issuance of a security of the Debtors; and
- d. Ankura was not, within two (2) years before the Petition Date, a director, officer, or employee of the Debtors or of any investment banker as specified in subparagraph (b) or (c) of this paragraph.

18. By reason of the foregoing, I believe Ankura is eligible for retention by the Debtors.

19. Although Ankura is unaware of any other connections at the present time, it is possible that Ankura may have provided services for certain other creditors or other parties of interest in these Cases in matters unrelated to the Debtors or the instant bankruptcy case. If I am provided any updates to the Parties in Interest list and become aware of any connections not already described herein, I will supplement this Declaration to disclose those facts.

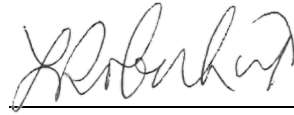
20. I am generally familiar with the Bankruptcy Code and the Bankruptcy Rules, and Ankura will comply with them, subject to the Orders of this Court.

21. This Declaration is being provided pursuant to Bankruptcy Code sections 327 and 328, and Bankruptcy Rule 2014.

[Signature page follows]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 23, 2021
Dallas, Texas

A handwritten signature in black ink, appearing to read "L. Robichaux IV", written over a horizontal line.

Louis E. Robichaux IV
Senior Managing Director
Ankura Consulting Group, LLC

EXHIBIT 1

Parties in Interest

1717 West 6th Street (TX), LLC
Abri at Brownwood
Abri at Stephenville (FKA: Senior Care at Stephenville)
Access Information Protected
ADP, Inc.
Advantage Laser Products Inc.
Alicia Weedman
Alliance Insurance Group
Allruva Technology Services Inc.
Amanda Arispe
Amarillo Corporate Services, LLC
Amber Jordan
American Association of Post-Acute Care Nursing (AAPACN)
American Capital Mortgage Invest. - Chi Javelin, LLC
American HealthTech
Amy Caperton
Amy Smith
Amy White
Anchor Claims Management
Angela Price
Angie Ramsey
Anita Mouton
Anthony Arnaudy
Ashley Morris
AT&T Mobility - 6463
AT&T019
Audra Phillips
Austin Geriatric Specialists PA
Beacon Harbor
Bell Nunnally & Martin LLP
Birch Communications (Fusion)
Blanks Printing and Imaging
Bobbie Davis
Breazeale Sachse & Wilson LLP
Brian Givens
Brittney Jones
Broadview Networks
Brownwood SCC, LLC (Opco)
Calysta Pebsworth
Caraday Health
Centers For Medicare & Medicaid Services

CenturyLink
CenturyLink Communications, LLC
Ceu360
Chaim N Hertzell
Choice! Energy Services Retail LP
Christopher Hodges
CJSM Partners
Clifton Larson Allen LLP
Clinical Resources LLC
Cogent Communications, Inc.
Community SCC, LLC (Opco)
Computer Sciences Corporation
Constellation NewEnergy, Inc.
Corporate Payment Systems
CourtCall LLC
Courtney Current
Coveware
Cowan Law Firm LLP
Cristina Smith
Crocker Moving & Storage
Crowley Nursing & Rehab
Crowley SCC, LLC (Opco)
Curaspan Health Group, Inc.
Cyxtera Communications LLC
Dallas County Tax Assessor
Dallas Security Systems
Dawn Raymond
Debbie Stapleton
Design Farm Inc.
Desiree Hodge
Diana Bello
Digital Air Strike
Dina Trew
Direct Supply
Direct Supply, DSSI
D.I. Johnson & Associates LLC
DKBInnovative, LLC
Dti Voice Data, Inc.
Duane Morris LLP
Eastland Memorial Hospital District
Emily Briggs
Emmanuel Ngoli
Eric Feinman
eSolutions, Inc.

ETC Lite, LLC
FedEx
File Pro Records Management Facility
First Insurance Funding
FlexCare
FTI Consulting, Inc.
FuseMind Inc
Gina Castro
Gladys Kutac
Green Oaks Nursing & Rehab
Green Oaks SCC, LLC (Opco)
Greenberg Traurig
Guide It
Hall, Gilligan, Roberts & Shanlever, LLP
Halperin Battaglia Benzija, LLP
Hammerman & Hultgren P.C.
Harbor Lakes Nursing & Rehab
Harbor Lakes SCC, LLC (Opco)
Hatkoff & Minassian ALC
H-C Associates, LTD
HCRW Associates, LTD
HDH Advisors LLC
Health Care Service Corporation, a Mutual Legal Reserve
Hewitt Nursing & Rehab
Hewitt SCC, LLC (Opco)
HH Back Office Services Put LTD
Hidalgo Healthcare Realty, LLC
Holland Lake Nursing & Rehab
Holland Lake SCC LLC (Opco)
Home Depot Pro - SupplyWorks
Inservio3
Iron Mountain
J S Fredericksburg Realty LP
Jameson and Dunagan, P.C.
Janet D. Watson
Janetta Spradling
Janice Templeton
Jaylyn Banks - Monasterial
Jennifer Torres
Jerrod R Landress
Jessica Ford
Jessica Turner
Josephkunju Paul Cheriathundam
Julie Huddleston

Kathryn Eleniewski
Kawana Smith
Kennedy Attorneys and Counselors at Law
Kimberly Harris
Kraig Turpen
Kyocera Document Solutions America Inc.
Language Line Services Inc.
Laurie Walther
Leslie Von Der Ahe
Lincoln Healthcare Leadership
Lisa Pair
Lisa Robinson
Littler Mendelson, PC
Long Hill Consulting I, LLC
Louisiana Secretary of State
Lowenstein Sandler LLP
LTC Properties, Inc.
Management and Network Services LLC
Maribeth Cantu
Marley Consulting and Mediation Services, Inc.
Mary Whitley
Mazars USA LLP
Medline Industries Inc.
Melodie Whitley
Michael Edward White
Mike Templeton
Minnae Bellard
Mira Vista Consulting, LLC
Mission Nursing and Rehabilitation Center
Mission SCC, LLC (Opco)
Nancy Hofmeister
Nancy Ivie
National Datacare Corporation
National Records Centers, Inc.
National Union Fire Insurance of Pittsburg, PA
Navex Global, Inc.
Neofunds By Neopost
Neopost USA Inc.
Netsmart Technologies
Newbridge Management LLC
Nixon Peabody LLP
Norman Kronick & Louis Dullen Prtns
Nova 401k Associates
Omni Management Group

Omnicare Inc.
Omni-Invictus, LLC
Pamila Joy
Paracorp Inc., DBA Parasec
PayTech Inc.
PC Connection Sales - Connection,Macconnect,Softmart
Perfect Gift, LLC
Pharmerica
Phillip Whirley
PlanSource Benefits Administration
PointClickCare Technologies, Inc.
Polsinelli
Pota JY, LLC
Preferred Resource Network, LLC
Principal Life Insurance Company
Pronske & Kathman P.C.
ProviderTrust, Inc.
PTOT Sales and Service, LLC
OBS, Inc.
Quintairos, Prieto, Wood & Boyer PA
Rebecca Liggett
Record Solutions LLC
Redoak Health and Rehabilitation Center
Redoak SCC, LLC (Opco)
Redoak Senior Care Center, LLC A Texas LLC (Propco)
Reliant Energy Retail Services, LLC Dept 0954
Review Trackers, Inc.
Rhonda (Jill) Hawkins
Robin E Phelan
RockCap Commercial Real Estate LLC
Ross & Smith, PC
Royal Imaging Services, LLC
Sabrina Hooks
Safeguard Data Storage
Safeshred, Inc.
Safesite Inc.
Secured Access Systems LLC
Senior Care at Holland Lake
Senior Care of Brownwood
Senior Care of Crowley
Senior Care of Green Oaks
Senior Care of Harbor Lakes
Senior Care of Hewitt
Senior Care of Stallings Court

Senior Care of Stonegate
Service Express, Inc.
Sharon Blackmon
Shred-It USA - Chicago
Sigma Actuarial Consulting Group, Inc.
SimpleLTC Systems Inc.
SK Global Software LLC
Smith & Douglas
Spencer Fane LLP
Stacey Cotton
Stallings Court Nursing & Rehab
Stallings Court SCC, LLC (Opco)
Staples Business Advantage (DSSI)
Stephen Duck, CPA P.C.
Sterling
Stonegate Nursing & Rehab
Stonegate SCC LLC (Opco)
Stuart Garner
Suma Thomas
Swerdlin & Company
SWTX Real Estate Investments, Inc., A Delaware Corp. (Propco)
SWTX Real Estate Investments, Inc., A Delaware Corp. (Propco)
Taffy Doggett
TAXL Corporation
Tanner Humm Web Design
Tech Dogs LLC
Teffanie Grijalva
Teri Jo Bonar
Texas Health and Human Services Comm
The Advisory Board Company
The Clampitt Companies LLC
Tialeah Wilson
Tiffani Roberts
Tim Edelhauser
Timothy Givens
TRU Group, LLC DBA Altruas
TXMS Real Estate Investments, Inc., A Delaware Corp. (Propco)
TXMS Real Estate Investments, Inc., A Delaware Corp. (Propco)
Unity Search LLC
US Postal Service
US Trustee Payment Center
UXC Eclipse (SUA) LLC DBA DXC Eclipse
Verizon Wireless - 660108
Veronica Castillo

Veronica Morris
Vickie Andrews
Walter Hadnot
WebTPA Employer Services
Wells Fargo Bank - MN
Wells Fargo Financial Leasing Inc.
Wendy Bailey
Wendy Burgess Tax Assessor Collector
West Fork Advisory Services LLC
West Oaks Nursing
Windstream
Xchive Business Intelligence, Inc.
Xerox Business Solutions, Southwest
Xerox Financial Services LLC
ZirMed, Inc.
Zoho Corporation
Zoom Video Communications, Inc.

EXHIBIT 2

Ankura Connections

Entity	Current Client	Past Client	Vendor
ADP, Inc.			X (ADP, LLC)
AT&T Mobility - 6463			X (AT&T Mobility II)
CenturyLink		X	
Clifton Larson Allen LLP			X
Cyxtera Communications LLC			X
Dallas County Tax Assessor			X (Dallas Tax Office)
Duane Morris LLP	X	X	
FedEx	X	X	X
FTI Consulting, Inc.	X	X	
Greenberg Traurig	X	X	X
Health Care Service Corporation, A Mutual Legal Reserve	X	X	
Home Depot Pro - SupplyWorks		X (Home Depot)	
Inservio3			X
Iron Mountain			X
Kyocera Document Solutions America Inc.		X (Kyocera Corp)	
Little Mendelson, PC	X	X	
Lowenstein Sandler LLP		X	
Medline Industries Inc.	X	X	
National Union Fire Insurance of Pittsburgh, PA	X	X	
Neopost USA Inc.			X
Nixon Peabody LLP	X	X	
Omnicare Inc.	X		
Omni-Invictus, LLC			X
Paytech Inc.		X	
PC Connection Sales - Connection, Macconnect, Softmart			X
Pharmerica		X	
Polsinelli	X	X	
Ross & Smith, PC	X		
Service Express, Inc.			X
Shred-It USA - Chicago			X
Spencer Fane LLP	X	X	
Staples Business Advantage (DSSI)			X (STAPLES)
The Clampitt Companies LLC		X (Clampitt Paper Company)	
US Postal Service	X		
Wells Fargo Bank - MN	X	X	

Entity	Current Client	Past Client	Vendor
Windstream	X		X
Xerox Business Solutions, Southwest		X (Xerox Business Services)	
Xerox Financial Services LLC			X
Zoho Corporation	X		
Zoom Video Communications, Inc.	X	X	X